

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

*IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION*

THIS DOCUMENT RELATES TO ALL
ACTIONS

MDL Docket No. 1456

Civil Action No. 01-12257-PBS

Judge Patti B. Saris

Chief Mag. Judge Marianne B. Bowler

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Local Rule 83.5.3, the undersigned counsel, Anthony A. Froio, hereby moves the Court for an Order allowing Thomas J. Poulin, Robins, Kaplan, Miller & Ciresi L.L.P., 1801 K Street, N. W., Suite 1200, Washington, D. C., Tel. (202) 775-0725 to appear and practice *pro hac vice* on behalf of non-parties and absent class members Blue Cross and Blue Shield of Vermont, CareFirst Blue Cross Blue Shield, Hawaii Medical Service Association, Excellus Blue Cross Blue Shield, Mutual of Omaha Insurance Company and Blue Cross Blue Shield of Massachusetts. As grounds for this motion, the undersigned states that:

1. I am duly admitted to practice before this Court and represent the non-parties and absent class members in the above-captioned action.
2. Mr. Poulin has prepared the Certification required by Local Rule 83.5.3(b), which has been filed together with this Motion.
3. I have provided Mr. Poulin with a complete copy of the Local Rules of the United States District Court for the District of Massachusetts.

4. Thomas J. Poulin is an attorney at the firm of Robins, Kaplan, Miller & Ciresi L.L.P. He is admitted to several United States District Courts, and the highest court of the state of Maine and the District of Columbia.

WHEREFORE, the undersigned counsel respectfully moves that Mr. Poulin be admitted to practice before this Court *pro hac vice*.

Dated: October 18, 2005

Respectfully submitted,

/s/ Anthony A. Froio
Anthony A. Froio, Esq. (BBO No. 554708)
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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for non parties and absent class members, have conferred with counsel for Defendants, and there is no objection to this Motion for Admission *Pro Hac Vice*.

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2005, I caused a true and correct copy of the foregoing to be served on all counsel of record electronically, pursuant to Section D of the Case Management Order No. 2.

/s/ Anthony A. Froio

DATED: October 18, 2005